From:	Janoski, Jason M.
Sent:	Tuesday, September 28, 2010 4:19 PM
To:	Emmons, Shannon K.
Cc:	Boden, Stacia G.; Rupe, Alan L.
Subject:	RE: Moran v. Avon Capital LLC - Disclosures and Mediation

Shannon,

Good afternoon. I'm working with Alan and Stacia on this matter.

Could you please provide us with the names of two or three more mediators to take into consideration as well as several proposed dates for mediation?

We're also looking into several mediators to propose ourselves.

Thank you kindly.

Jason Janoski
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Admitted in Kansas

-----Original Message-----
From: Emmons, Shannon K. [mailto:skemmons@phillipsmurrah.com]
Sent: Monday, September 27, 2010 1:28 PM
To: Boden, Stacia G.
Cc: Janoski, Jason M.; Rupe, Alan L.
Subject: RE: Moran v. Avon Capital LLC - Disclosures and Mediation

Stacia,

I started to feel faint when I saw the reference to "20,000+ page document production," then realized it was not our case. Can we agree to overnight our respective client's document production? We had planned to email ours, but loading it on a disk will be less problematic.
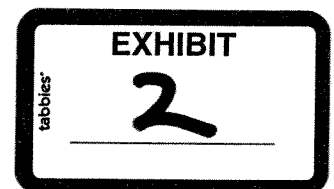
The mediator I mentioned was Steve Barghols. He is with Gable Gotwals. The firm's website is www.gablelaw.com. I have asked Steve to send me his CV, which I will forward to you.

Your new adventure sounds exciting, although I'm sorry to see you leaving the case. I have enjoyed working with you and wish you all the best.

Shannon

-----Original Message-----
From: Boden, Stacia G. [mailto:Stacia.Boden@KutakRock.com]
Sent: Monday, September 27, 2010 11:33 AM
To: Emmons, Shannon K.
Cc: Janoski, Jason M.; Rupe, Alan L.
Subject: Moran v. Avon Capital LLC - Disclosures and Mediation

EXHIBIT
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Shannon,

We are still processing the documents we received from our client but we intend to produce these today - it just might be late today. Depending on the size, we will figure out the best way to send. It will most likely be by mail on a disk. We were overwhelmed by a 20,000+ page document production that is due today in another case so I am short on help. But we'll get it done.

On mediation, I recall you sending me some names of mediators - but I can't find my note on that. Can you resend? Can you also provide me available dates for you and your client over the next 30-45 days?

Finally, on a parting note, I will be departing from Kutak in the coming weeks to take on a new adventure as in-house counsel. Jason Janoski from our firm will be assisting Alan Rupe on this file from here forward. To help with the transition, would you please direct your correspondence to Jason but cc me for the next week or so? I would greatly appreciate it. I have appreciated your professionalism that you have shared in your advocacy of your client's case.

I am attaching contact information for both Jason and Alan should you need to reach either.

Stacia

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